IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FUJIAN MINGTA TOYS CO. LTD.,

Plaintiff,

v.

THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",

Defendants.

Civil Action No. 1:24-cv-05625

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Wednesday, March 19, 2025, at 11:00 a.m., Plaintiff Fujian Mingta Toys Co. Ltd., by its counsel, shall appear before the Honorable John Robert Blakey to present the following request and motion:

- (a) Request for Entry of Default (Dkt. No. 63); and
- (b) Motion for Entry of Default Judgment (Dkt. No. 67).

DATED: March 14, 2025 Respectfully submitted,

By: /s/ Nicholas Najera

Nicholas Najera Texas Bar No. 24127049 nnajera@nilawfirm.com

NI, WANG & MASSAND, PLLC 8140 Walnut Hill Ln., Ste. 615 Dallas, TX 75231

Tel: (972) 325-2220 Fax: (972) 314-0900

Counsel for Plaintiff